



The New York Times
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BY ECF

The Honorable J. Paul Oetken
U.S. District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *New York Times Co. v. Department of State*, 22 Civ. 791 (JPO)

Dear Judge Oetken:

We write respectfully on behalf of all parties to provide a status report in the above-captioned action brought under the Freedom of Information Act (“FOIA”).

Since the parties’ last status report, the Department of State has completed its production of records responsive to plaintiff’s FOIA request. In some instances, records have been redacted or otherwise withheld pursuant to exemptions to FOIA. The Times currently is engaged in reviewing those productions and the parties plan to meet and confer to determine what, if any, issues remain to be resolved in the litigation.

The parties had previously proposed to inform the Court in this status report as to whether summary judgment motion practice will be necessary, and the Court endorsed that proposal. ECF No. 22. The parties respectfully request to defer that question until the next status report, to enable the parties to continue their meet and confer to determine whether it is possible to resolve any outstanding issues without motion practice.

The parties respectfully propose to file the next status report on or before October 30, 2023.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

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